

# PBW

*Consulting Engineers  
and Scientists*

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ENCLOSURE NOT INCLUDED

October 6, 2005  
(PBW Project No. 1259)

VIA OVERNIGHT DELIVERY

Mr. M. Gary Miller, Remedial Project Manager  
U.S. Environmental Protection Agency, Region 6  
Superfund Division (6SF-AP)  
1445 Ross Avenue, Suite 1200  
Dallas, Texas 75202-2733

Ms. Barbara A. Nann, Assistant Regional Counsel  
U.S. Environmental Protection Agency, Region 6  
Superfund Division (6RC-S)  
1445 Ross Avenue, Suite 1200  
Dallas, Texas 75202-2733

Re: Draft RI/FS Work Plan and Draft Sampling and Analysis Plan, Gulfco Marine  
Maintenance Site, Freeport, Texas

Dear Mr. Miller and Ms. Nann:

Pursuant to Section V, Paragraphs 17 and 25 of the Statement of Work (SOW) attached to the modified Unilateral Administrative Order (UAO) for the above-referenced Site, Pastor, Behling & Wheeler, LLC (PBW) has prepared the enclosed Draft RI/FS Work Plan and Draft Sampling and Analysis Plan (SAP) on behalf of LDL Coastal Limited LP (LDL), Chromalloy American Corporation (Chromalloy) and The Dow Chemical Company (Dow)(collectively referred to as Respondents in the UAO). The UAO-specified submittal date for these documents was September 27, 2005; however, as detailed in a letter dated September 23, 2005 from Ms. Elizabeth Webb of Thompson & Knight, LLP to you, the Respondents requested that the submittal date be extended to October 11, 2005. The enclosed documents are provided in accordance with that extended submittal date.

The SAP consists of two volumes: Volume I is the Field Sampling Plan (FSP) and Volume II is the Quality Assurance Project Plan (QAPP). Consistent with the requirements of the SOW, the RI/FS Work Plan, the FSP and the QAPP are submitted as drafts for your review and comment. In accordance with Paragraph 52 of the UAO, I certify that I have been fully authorized by the Respondents to submit these documents and to legally bind all Respondents thereto.



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Mr. Miller and Ms. Nann

October 6, 2005

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Thank you for the opportunity to submit these documents. Please provide comments at your convenience. Should you have any questions, do not hesitate to contact me.

Sincerely,

PASTOR, BEHLING & WHEELER, LLC



Eric F. Pastor, P.E.

Principal Engineer

Enclosure (three copies of each document)

cc (one copy each):

Ms. Pamela Travis - U.S. Environmental Protection Agency  
Ms. Luda Voskov - Texas Commission on Environmental Quality  
Ms. Jessica White - National Oceanic and Atmospheric Administration  
Ms. Tammy Ash - U.S. Fish and Wildlife Service  
Mr. Brian Cain - U.S. Fish and Wildlife Service  
Mr. Richard Seiler - Texas Commission on Environmental Quality  
Mr. Keith Tischler - Texas General Land Office  
Mr. Don Pitts - Texas Parks and Wildlife Department  
Mr. Andy Tirpik - Texas Parks and Wildlife Department

Mr. Brent Murray - Sequa Corporation  
Mr. Scott Magelssen - The Dow Chemical Company  
Mr. Allen Daniels - LDL Coastal Limited, LP  
Mr. F. William Mahley - Strasburger & Price, LLP  
Mr. James C. Morris III - Thompson & Knight, LLP  
Ms. Elizabeth Webb - Thompson & Knight, LLP  
Dr. Bill Quast - Benchmark Ecological Services, Inc.  
Ms. Taryn Scholz - Quality Assurance Associates, LLC  
Mr. Ed Gallagher - Gulf Coast Analytical Laboratories, Inc.